



U.S. Department of Justice

United States Attorney
District of New Jersey

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July 15, 2025

The Honorable Robert Kirsch
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

SO ORDERED


Robert Kirsch, U.S.D.J.

Date: *July 16, 2025*

Re: *United States v. Silber*, 24-446 (RK)
United States v. Schulman, 24-497 (RK)

Dear Judge Kirsch:

The Government and defendants ("Parties") in the above cases jointly write the Court regarding the upcoming deadline to set restitution, which Your Honor previously extended until July 16, 2025. The Receiver for the Williamsburg of Cincinnati Apartments has selected a winning bidder for the sale of the property, but the period of due diligence extends until July 23, 2025. Should the parties continue with the sale after the due diligence period expires, the Receiver will move for a sale of property, at which time the parties will be informed of the sale price.

The Parties have been actively working on reaching a restitution obligation that takes the sale price into account, ensures the victim receives appropriate restitution related to these matters, and minimizes the issues (if any) requiring the Court's time and attention. To that end, the Parties jointly request the Court enter a 45-day extension to afford them additional time to finalize the restitution amount. *See Dolan v. United States*, 560 U.S. 605 (2010) (sentencing court can order restitution beyond initial 90-day statutory deadline).

Respectfully submitted,

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Jerome Ballarotto, Esq. and Eric Kanefsky, Esq. (Counsel for Silber)